

American Savings Bank (In re: Nobleman), 508 U.S. 324 (1993) prohibit the Debtor's proposed modification of Creditor's mortgage.

WHEREFORE, Creditor respectfully requests the Court to deny confirmation of the Debtor's proposed Chapter 13 Plan.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Kimberly A. Bonner (89705)

Adam B. Hall (323867)

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Attorneys for Creditor

The case attorney for this file is Karina Velter.

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
: **Case No.: 18-13429**
John Borschel AKA John C. Borschel, : **Chapter 13**
AKA John Clifton Borschel, DBA : **Judge Richard E. Fehling**
Allentown Catering : *********
: **Debtor(s).**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objection to Debtor's

Chapter 13 Plan was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,
Philadelphia, PA 19107

William C. Miller, Chapter 13 Trustee, Chapter 13 Trustee, 2901 St. Lawrence Ave., Reading,
PA 19606

Barton Knochenmus, Attorney for John Borschel DBA Allentown Catering, 1275 Glenlivet
Drive Suite 100, Allentown, Allentown, PA 18106-3107, knochenmuslaw@gmail.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on September 7,
2018:

John Borschel AKA John C. Borschel, AKA John Clifton Borschel, DBA Allentown
Catering, 1730 Blue Barn Road, Orefield, PA 18069

DATE: 9/7/18

/s/ Karina Velter

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